

EXHIBIT 1

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9 Attorneys for Plaintiff WAYMO LLC

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 WAYMO LLC

14 Plaintiffs,

15 v.

16 UBER TECHNOLOGIES, INC.;
17 OTTOMOTTO, LLC; OTTO TRUCKING
18 LLC,

19 Defendants.

Case No. 17-cv-00939-JCS

**PLAINTIFF'S OBJECTIONS AND
RESPONSES TO UBER'S AND
OTTOMOTTO'S FIRST SET OF
REQUESTS FOR PRODUCTIONS (NOS.
1-146)**

1 Plaintiff Waymo, LLC (“Waymo”) hereby objects and responds to the First Set of
2 Requests for Production of Documents (Nos. 1-146) served by Defendants Uber Technologies,
3 Inc. (“Uber”) and Ottomotto LLC (“Otto”) (collectively, “Defendants”).

4 **GENERAL OBJECTIONS**

5 Waymo makes the following General Objections, whether or not separately set forth in
6 response to each and every definition and document request.

7 Waymo objects to each request, and to the Definitions and Instructions, to the extent that
8 they purport to impose any obligations upon Waymo beyond the Federal Rules of Civil Procedure,
9 the Local Rules of the United States District Court for the Northern District of California, and the
10 Supplemental Order to Order Setting Initial Case Management Conference in Civil Cases Before
11 Judge William Alsup (“the Supplemental Order”).

12 Waymo objects to each request to the extent that it seeks information protected by the
13 attorney-client privilege or the work product doctrine or that is otherwise privileged or protected
14 from discovery.

15 Waymo objects to each request to the extent that they are compound, complex and contain
16 multiple subparts.

17 Waymo objects to each request to the extent that they seek confidential or proprietary
18 information, including without limitation, confidential business information, proprietary and/or
19 competitively sensitive information, or trade secrets. Subject to its other General Objections, and
20 to any specific objections set forth below, Waymo will only provide relevant information in a
21 manner consistent with the Protective Order entered by the Court in this matter.

22 Waymo objects to each interrogatory to the extent that they seek information that Waymo
23 is not permitted to disclose pursuant to confidentiality obligations or agreements with third parties.

24 Waymo objects to each request to the extent that it calls for information that is publicly
25 available and therefore as accessible to Defendants as to Waymo.

26 Waymo objects to each request to the extent that it is overbroad and not proportional to the
27 needs of the case, considering the importance of the issues at stake in the action, the amount in
28 controversy, the parties’ relative access to relevant information, the parties’ resources, the

1 importance of the discovery in resolving the issues, and whether the burden or expense of the
2 proposed discovery outweighs its likely benefit.

3 Waymo objects to each request to the extent that they require Waymo to provide
4 documents beyond what is available to Waymo at present from a reasonable search of its own files
5 likely to contain relevant or responsive documents.

6 Waymo objects to each request to the extent that they are overbroad, unduly burdensome,
7 vague, and/or ambiguous.

8 Waymo objects to each request to the extent that it seeks information that does not already
9 exist, or that is not in Waymo's possession, custody, or control.

10 Waymo objects to each request to the extent that they are unlimited in time or otherwise
11 not limited to a time frame relevant to this litigation and to the patents-in-suit, and therefore
12 burdensome, oppressive, overly broad, and not proportional to the needs of the case.

13 Waymo objects to the definitions of "Waymo," "Plaintiff," "You," and "Your" on the
14 grounds the definitions are overbroad, unduly burdensome, and vague, including, but not limited
15 to, the extent that they include Alphabet Inc. or any Waymo subsidiary, subcontractor, partnership,
16 joint venture, or other business cooperation involving Waymo LLC, Google Inc., and/or Alphabet
17 Inc., the present and former officers, directors, employees, agents, representatives, accountants,
18 financial advisors, consultants, and attorneys or other persons under the owned or controlled by
19 Waymo LLC, Google Inc., and/or Alphabet Inc., regardless of their affiliation or employment.

20 Waymo objects to each and every request to the extent that they call for a legal conclusion.

21 Waymo objects to the definitions of "Uber", "Ottomotto," and "Otto Trucking" as
22 overbroad, and vague and ambiguous because Waymo does not know, for example, all "agents" or
23 "representatives," etc. of each entity.

24 Waymo objects to the definition of "Velodyne" as overbroad, and vague and ambiguous
25 because Waymo does not know, for example, all "agents" or "representatives", etc. of Velodyne.

26 Waymo objects to the definition of "Side Project(s)" and "Side Business(es)" as overly
27 broad, unduly burdensome, vague and ambiguous, to the extent that the definition includes
28 personal side project(s) or business(es).

1 Waymo objects to Instruction No. 3 as irrelevant, overbroad, unduly burdensome, and not
2 proportional to the needs of the case to the extent it calls for production in a form beyond that
3 required by the Supplemental Order.

4 Waymo objects to Instruction No. 5 as irrelevant, overbroad, unduly burdensome, and not
5 proportional to the needs of the case to the extent it calls for “[a]ll drafts of a responsive
6 document.”

7 Waymo objects to Instruction No. 6 as irrelevant, overbroad, unduly burdensome, and not
8 proportional to the needs of the case to the extent that it calls for the “file folder or other container
9 in which a Document is kept.”

10 Waymo objects to Instruction No. 10 as overbroad, unduly burdensome, vague, and
11 ambiguous to the extent that it refers to “Provision 1(d) of the Default Standard for Discovery in
12 this judicial district.”

13 Waymo objects to Instruction No. 11 to the extent it calls for Waymo to search for
14 documents beyond what is available to Waymo at present from a reasonable search of its own files
15 likely to contain relevant or responsive documents. Waymo will produce English translations
16 where applicable as located through a reasonably diligent search.

17 Waymo objects to Instruction No. 12 to the extent that it calls for Waymo to conclude that
18 Waymo has no responsive documents in Waymo’s possession, custody, or control. If Waymo is
19 unable to locate responsive documents through a reasonably diligent search, Waymo will so state.

20 Waymo’s responses are not to be construed as an admission that any of the requested
21 information exists, that any information is admissible, relevant or proportional to the needs of the
22 case, or that any contention or assumption contained in the requests, whether implicit or explicit,
23 is correct.

24 Waymo responds to these requests based upon its current understanding and reserves the
25 right to supplement its responses at a later time.

26 Waymo incorporates by reference its General Objections in each of the specific responses
27 set forth below.
28

1 **REQUEST FOR PRODUCTION NO. 20:**

2 Documents sufficient to show Waymo's acquisition or use of any third party's LiDAR
3 technology.

4
5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 20:**

6 Waymo will produce all documents relating to Waymo's development of the Alleged
7 Waymo Trade Secrets as located through a reasonably diligent search of both custodial documents
8 and non-custodial document repositories storing documents relating to the development of
9 Waymo's self-driving car technology, including documents relating to Waymo's acquisition or
10 use of any third party's LiDAR technology.

11
12 **REQUEST FOR PRODUCTION NO. 21:**

13 All documents supporting Waymo's contention that Uber is using any Alleged Waymo
14 Trade Secret, including documents sufficient to show Waymo's first notice of any alleged use.

15
16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 21:**

17 Waymo objects to this request on the ground that documents demonstrating Uber's use of
18 the Alleged Waymo Trade Secrets are in Uber's possession, custody, or control.

19 Waymo has produced documents sufficient to show Waymo's first notice of any alleged
20 use. *See, e.g.*, WAYMO-UBER-00001746, WAYMO-UBER-00000633.

21
22 **REQUEST FOR PRODUCTION NO. 22:**

23 All documents relating to any efforts by Waymo to review, analyze, or reverse engineer
24 Defendants' LiDAR technology, including any review, analyses, or internal correspondence at
25 Waymo concerning the PCB attached to the email in Exhibit 1 to the Grossman Declaration in
26 support of Waymo's preliminary injunction motion.

1 Waymo has already produced documents underlying Waymo's forensic investigation into
2 Messrs. Levandowski, Kshirsagar, and Raduta as detailed in the Declaration of Gary Brown (Dkt.
3 25-29). *See* WAYMO-UBER-00000648-943; WAYMO-UBER-00004330-4336. Waymo will
4 not produce additional documents.

5
6 **REQUEST FOR PRODUCTION NO. 47:**

7 All documents relating to communications within and outside Waymo about the possibility
8 of pursuing a legal action against Anthony Levandowski.

9
10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 47:**

11 Waymo objects to this request as irrelevant, overbroad, and not proportional to the needs
12 of the case to the extent it seeks documents concerning the possibility of pursuing a legal action
13 against Uber other than this action, No. 3:17-cv-00939-WHA. Waymo objects to this request to
14 the extent that it seeks information protected by the attorney-client privilege or the work product
15 doctrine or that is otherwise privileged or protected from discovery. Waymo objects to this
16 request to the extent that it is duplicative of Expedited Discovery Request No. 4 to Larry Page
17 ("Communications about the possibility of pursuing a legal action against Anthony Levandowski
18 or Defendants."). On April 27, 2017, in response to that request, Waymo responded: "Pursuant to
19 the Court's Order today regarding RFP No. 4, and without waiver of attorney-client privilege,
20 attorney work product protection, or any other applicable privilege or protection and after a
21 reasonable and diligent investigation, Waymo states that Google Inc.'s first communication in
22 relation to the possibility of legal action against Anthony Levandowski was on or about March 23,
23 2016."

24 Waymo will log the document memorializing the March 23, 2016 communication.

25
26 **REQUEST FOR PRODUCTION NO. 48:**

27 All documents relating to communications about the possibility of pursuing a legal action
28 against Uber.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 48:**

2 Waymo objects to this request as irrelevant, overbroad, and not proportional to the needs
3 of the case to the extent it seeks documents concerning the possibility of pursuing a legal action
4 against Uber other than this action, No. 3:17-cv-00939-WHA. Waymo objects to this request to
5 the extent that it seeks information protected by the attorney-client privilege or the work product
6 doctrine or that is otherwise privileged or protected from discovery. Waymo objects to this
7 request to the extent that it is duplicative of Expedited Discovery Request No. 4 to Larry Page
8 (“Communications about the possibility of pursuing a legal action against Anthony Levandowski
9 or Defendants.”). On April 27, 2017, in response to that request, Waymo responded: “Pursuant to
10 the Court’s Order today regarding RFP No. 4, and without waiver of attorney-client privilege,
11 attorney work product protection, or any other applicable privilege or protection and after a
12 reasonable and diligent investigation, Waymo states that Google Inc.’s first communication in
13 relation to the possibility of legal action against Anthony Levandowski was on or about March 23,
14 2016.”

15 Waymo will log the document memorializing the March 23, 2016 communication.
16

17 **REQUEST FOR PRODUCTION NO. 49:**

18 All documents relating to communications about the possibility of pursuing a legal action
19 against Ottomotto.
20

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 49:**

22 Waymo objects to this request as irrelevant, overbroad, and not proportional to the needs
23 of the case to the extent it seeks documents concerning the possibility of pursuing a legal action
24 against Uber other than this action, No. 3:17-cv-00939-WHA. Waymo objects to this request to
25 the extent that it seeks information protected by the attorney-client privilege or the work product
26 doctrine or that is otherwise privileged or protected from discovery. Waymo objects to this
27 request to the extent that it is duplicative of Expedited Discovery Request No. 4 to Larry Page
28 (“Communications about the possibility of pursuing a legal action against Anthony Levandowski

1 information, the parties' resources, the importance of the discovery in resolving the issues, and
2 whether the burden or expense of the proposed discovery outweighs its likely benefit. Waymo
3 also objects to this request to the extent that it seeks information protected by the attorney-client
4 privilege or the work product doctrine or that is otherwise privileged or protected from discovery.

5 Waymo will not produce documents responsive to this request.

6
7 **REQUEST FOR PRODUCTION NO. 69:**

8 Documents sufficient to show any bonus program for Waymo LLC or Project Chauffeur
9 employees, including but not limited to specific bonuses paid out over time and to whom; related
10 policies; practices and/or procedures; the determination, calculation, changes to, and timing of any
11 valuations; and inquiries from participants of the plan.

12
13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 69:**

14 Waymo will produce documents sufficient to show the Project Chauffeur bonus program,
15 including its structure, valuations, and bonus payments made to individual recipients.

16
17 **REQUEST FOR PRODUCTION NO. 70:**

18 All documents relating to Waymo's evaluation of Anthony Levandowski's performance,
19 including any praise or criticism of his performance and any assessment of his value to Waymo.

20
21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 70:**

22 Waymo will produce all documents relating to Waymo's evaluation of Anthony
23 Levandowski's performance located through a reasonably diligent search, including periodic
24 performance reviews and other communications.

25
26 **REQUEST FOR PRODUCTION NO. 71:**

27 Documents sufficient to show to the reason(s) for the establishment, creation, or formation
28 of Waymo LLC.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 81:**

2 Waymo will produce all documents on which Waymo intends to rely to demonstrate
3 secondary considerations of nonobviousness.
4

5 **REQUEST FOR PRODUCTION NO. 82:**

6 All documents relating to Waymo's knowledge of Ottomotto (or 280 Systems) prior to its
7 formation, including the knowledge of or involvement in Ottomotto (or 280 Systems) of Pierre-
8 Yves Droz or Brian Salesky, beginning at least in or around "the summer of 2015" and continuing
9 through at least in or around January 2016.
10

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 82:**

12 Waymo will produce any communications amongst Waymo personnel as located through a
13 reasonably diligent search, including but not limited to communications involving Mr. Droz and
14 Mr. Salesky, sufficient to show Waymo's knowledge of Ottomotto or 280 Systems prior to its
15 formation.
16

17 **REQUEST FOR PRODUCTION NO. 83:**

18 All documents relating to Waymo's view of or reaction to the formation of Ottomotto,
19 including but not limited to John Krafcik's August 2016 communication(s) with Uber.
20

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 83:**

22 Waymo will produce documents sufficient to show Waymo's knowledge of Defendants'
23 autonomous vehicle program, including Waymo's view of or reaction to the formation of
24 Ottomotto, as located after a diligent search of custodial documents.
25

26 **REQUEST FOR PRODUCTION NO. 84:**

27 All documents relating to 510 Systems' acquisition by Google, including any documents
28 concerning technology brought by 510 Systems to Google.

1 Because Waymo has already produced documents sufficient to respond to this request,
2 Waymo will not produce additional documents.

3
4 **REQUEST FOR PRODUCTION NO. 95:**

5 Documents relating to Waymo's financial analysis and projections of the Waze acquisition
6 as related to Waymo's ride-sharing business, including documents relating to Waymo's pre- and
7 post-acquisition business plans for Waze, and any retrospective analysis of the acquisition.

8
9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 95:**

10 After a reasonably diligent search of Waymo's document repositories and custodial
11 documents, Waymo has not located any documents responsive to this request.

12
13 **REQUEST FOR PRODUCTION NO. 96:**

14 All documents relating to Waymo's discussion of Uber or its business.

15
16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 96:**

17 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
18 the case to the extent it seeks documents relating to discussions of Uber unrelated to Uber's status
19 as a Waymo competitor in the self-driving car space.

20 In addition to documents already produced relating to Waymo's discussion of Uber's ride-
21 sharing business, including, *e.g.*, WAYMO-UBER-00004115, WAYMO-UBER-00004175, and
22 WAYMO-UBER-00004197-98, Waymo will supplement its production of documents sufficient to
23 show Waymo's knowledge of Defendants' autonomous vehicle program, including discussion of
24 Defendants' self-driving car business, as located through a reasonably diligent search.

25
26 **REQUEST FOR PRODUCTION NO. 97:**

27 All documents relating to Waymo's analysis of Uber's ride-sharing business.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 97:**

2 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
3 the case to the extent it seeks documents relating to discussions of Uber unrelated to Uber's status
4 as a Waymo competitor in the self-driving car space.

5 In addition to documents already produced relating to Waymo's discussion of Uber's ride-
6 sharing business, including, *e.g.*, WAYMO-UBER-00004115, WAYMO-UBER-00004175, and
7 WAYMO-UBER-00004197-98, Waymo will supplement its production of documents sufficient to
8 show Waymo's knowledge of Defendants' autonomous vehicle program, including discussion of
9 Defendants' self-driving car business, as located through a reasonably diligent search.

10
11 **REQUEST FOR PRODUCTION NO. 98:**

12 Documents relating to the development of the placement and positions of laser diodes in
13 Waymo's LiDAR systems.

14
15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 98:**

16 Waymo will produce all documents relating to Waymo's development of the Alleged
17 Waymo Trade Secrets as located through a reasonably diligent search of both custodial documents
18 and non-custodial document repositories storing documents relating to the development of
19 Waymo's self-driving car technology, including documents relating to the development of the
20 placement and positions of laser diodes in Waymo's LiDAR systems.

21
22 **REQUEST FOR PRODUCTION NO. 99:**

23 Documents relating to the development of optical layouts in Waymo's LiDAR systems.

24
25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 99:**

26 Waymo will produce all documents relating to Waymo's development of the Alleged
27 Waymo Trade Secrets as located through a reasonably diligent search of both custodial documents
28 and non-custodial document repositories storing documents relating to the development of

1 **REQUEST FOR PRODUCTION NO. 133:**

2 All documents relating to any business relationship or rejection of any business
3 relationship by Waymo with Tyto LiDAR, LLC.
4

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 133:**

6 Waymo will produce all documents relating to any business relationship or rejection of any
7 business relationship by Waymo with Tyto LiDAR, LLC, as located through a reasonably diligent
8 search.
9

10 **REQUEST FOR PRODUCTION NO. 134:**

11 All documents relating to the resignation of David Drummond from Uber's Board of
12 Directors.
13

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 134:**

15 Waymo objects to this request as irrelevant. Waymo further objects that the irrelevant
16 documents sought are not proportional to the needs of the case, considering the importance of the
17 issues at stake in the action, the amount in controversy, the parties' relative access to relevant
18 information, the parties' resources, the importance of the discovery in resolving the issues, and
19 whether the burden or expense of the proposed discovery outweighs its likely benefit.

20 Waymo will not produce documents responsive to this request.
21

22 **REQUEST FOR PRODUCTION NO. 135:**

23 All documents relating to communications between Anthony Levandowski and Larry Page
24 relating to the acquisition of 510 systems, the formation of 280 Systems or Ottomotto, and Mr.
25 Levandowski's departure from Waymo.
26
27
28

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 143:**

2 Waymo states that after a reasonably diligent search, Waymo has not located any
3 communications between Quinn Emanuel and Waymo regarding Anthony Levandowski prior to
4 the filing of the arbitration lawsuits in October 2016 against Mr. Levandowski.
5

6 **REQUEST FOR PRODUCTION NO. 144:**

7 Documents sufficient to show the dates of the communications between Quinn Emanuel
8 Urquhart & Sullivan, LLP and Waymo regarding Uber prior to the filing of the arbitration lawsuits
9 in October 2016 against Mr. Levandowski.
10

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 144:**

12 Waymo states that after a reasonably diligent search, Waymo has not located any
13 communications between Quinn Emanuel and Waymo regarding Anthony Levandowski prior to
14 the filing of the arbitration lawsuits in October 2016 against Mr. Levandowski.
15

16 **REQUEST FOR PRODUCTION NO. 145:**

17 Documents sufficient to show the dates of the communications between any law firm and
18 Waymo regarding Anthony Levandowski prior to the filing of the arbitration lawsuits in October
19 2016 against Mr. Levandowski.
20

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 145:**

22 Waymo objects to this request to the extent that it seeks information protected by the
23 attorney-client privilege or the work product doctrine or that is otherwise privileged or protected
24 from discovery.

25 Waymo objects to this request to the extent that it is duplicative of Expedited Discovery
26 Request No. 4 to Larry Page (“Communications about the possibility of pursuing a legal action
27 against Anthony Levandowski or Defendants.”). On April 27, 2017, in response to that request,
28 Waymo responded: “Pursuant to the Court’s Order today regarding RFP No. 4, and without

1 waiver of attorney-client privilege, attorney work product protection, or any other applicable
2 privilege or protection and after a reasonable and diligent investigation, Waymo states that Google
3 Inc.'s first communication in relation to the possibility of legal action against Anthony
4 Levandowski was on or about March 23, 2016."

5 Waymo will log the document memorializing the March 23, 2016 communication.

6
7 **REQUEST FOR PRODUCTION NO. 146:**

8 Documents sufficient to show the dates of the communications between any law firm and
9 Waymo regarding Uber prior to the filing of the arbitration lawsuits in October 2016 against Mr.
10 Levandowski.

11
12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 146:**

13 Waymo objects to this request to the extent that it seeks information protected by the
14 attorney-client privilege or the work product doctrine or that is otherwise privileged or protected
15 from discovery.

16 In response to this request, Waymo will produce or log documents sufficient to show when
17 Waymo first communicated about the possibility of pursuing this legal action against Uber.

18
19 DATED: June 12, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

20
21 By /s/ Charles K. Verhoeven

Charles K. Verhoeven
Attorneys for WAYMO LLC

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9 Attorneys for Plaintiff WAYMO LLC

10 UNITED STATES DISTRICT COURT
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12 SAN FRANCISCO DIVISION

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16 UBER TECHNOLOGIES, INC.;
17 OTTOMOTTO, LLC; OTTO TRUCKING
18 LLC,

19 Defendants.

Case No. 17-cv-00939-JCS

**PLAINTIFF'S RESPONSES AND
OBJECTIONS TO UBER'S SECOND SET
OF REQUESTS FOR PRODUCTIONS
(NOS. 147-162)**

1 Plaintiff Waymo, LLC (“Waymo”) hereby objects and responds to the Second Set of
2 Requests for Production of Documents (Nos. 147-162) served by Defendants Uber Technologies,
3 Inc. (“Uber”) and Ottomotto LLC (“Otto”) (collectively, “Defendants”).

4 **GENERAL OBJECTIONS**

5 Waymo makes the following General Objections, whether or not separately set forth in
6 response to each and every definition and document request.

7 Waymo objects to each request, and to the Definitions and Instructions, to the extent that
8 they purport to impose any obligations upon Waymo beyond the Federal Rules of Civil Procedure,
9 the Local Rules of the United States District Court for the Northern District of California, and the
10 Supplemental Order to Order Setting Initial Case Management Conference in Civil Cases Before
11 Judge William Alsup (“the Supplemental Order”).

12 Waymo objects to each request to the extent that it seeks information protected by the
13 attorney-client privilege or the work product doctrine or that is otherwise privileged or protected
14 from discovery.

15 Waymo objects to each request to the extent that they are compound, complex and contain
16 multiple subparts.

17 Waymo objects to each request to the extent that they seek confidential or proprietary
18 information, including without limitation, confidential business information, proprietary and/or
19 competitively sensitive information, or trade secrets. Subject to its other General Objections, and
20 to any specific objections set forth below, Waymo will only provide relevant information in a
21 manner consistent with the Protective Order entered by the Court in this matter.

22 Waymo objects to each interrogatory to the extent that they seek information that Waymo
23 is not permitted to disclose pursuant to confidentiality obligations or agreements with third parties.

24 Waymo objects to each request to the extent that it calls for information that is publicly
25 available and therefore as accessible to Defendants as to Waymo.

26 Waymo objects to each request to the extent that it is overbroad and not proportional to the
27 needs of the case, considering the importance of the issues at stake in the action, the amount in
28 controversy, the parties’ relative access to relevant information, the parties’ resources, the

1 importance of the discovery in resolving the issues, and whether the burden or expense of the
2 proposed discovery outweighs its likely benefit.

3 Waymo objects to each request to the extent that they require Waymo to provide
4 documents beyond what is available to Waymo at present from a reasonable search of its own files
5 likely to contain relevant or responsive documents.

6 Waymo objects to each request to the extent that they are overbroad, unduly burdensome,
7 vague, and/or ambiguous.

8 Waymo objects to each request to the extent that it seeks information that does not already
9 exist, or that is not in Waymo's possession, custody, or control.

10 Waymo objects to each request to the extent that they are unlimited in time or otherwise
11 not limited to a time frame relevant to this litigation and to the patents-in-suit, and therefore
12 burdensome, oppressive, overly broad, and not proportional to the needs of the case.

13 Waymo objects to the definitions of "Waymo," "Plaintiff," "You," and "Your" on the
14 grounds the definitions are overbroad, unduly burdensome, and vague, including, but not limited
15 to, the extent that they include Alphabet Inc. or any Waymo subsidiary, subcontractor, partnership,
16 joint venture, or other business cooperation involving Waymo LLC, Google Inc., and/or Alphabet
17 Inc., the present and former officers, directors, employees, agents, representatives, accountants,
18 financial advisors, consultants, and attorneys or other persons under the owned or controlled by
19 Waymo LLC, Google Inc., and/or Alphabet Inc., regardless of their affiliation or employment.

20 Waymo objects to each and every request to the extent that they call for a legal conclusion.

21 Waymo objects to the definitions of "Uber", "Ottomotto," and "Otto Trucking" as
22 overbroad, and vague and ambiguous because Waymo does not know, for example, all "agents" or
23 "representatives," etc. of each entity.

24 Waymo objects to the definition of "Velodyne" as overbroad, and vague and ambiguous
25 because Waymo does not know, for example, all "agents" or "representatives", etc. of Velodyne.

26 Waymo objects to the definition of "Side Project(s)" and "Side Business(es)" as overly
27 broad, unduly burdensome, vague and ambiguous, to the extent that the definition includes
28 personal side project(s) or business(es).

1 Waymo objects to Instruction No. 3 as irrelevant, overbroad, unduly burdensome, and not
2 proportional to the needs of the case to the extent it calls for production in a form beyond that
3 required by the Supplemental Order.

4 Waymo objects to Instruction No. 5 as irrelevant, overbroad, unduly burdensome, and not
5 proportional to the needs of the case to the extent it calls for “[a]ll drafts of a responsive
6 document.”

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8 proportional to the needs of the case to the extent that it calls for the “file folder or other container
9 in which a Document is kept.”

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11 ambiguous to the extent that it refers to “Provision 1(d) of the Default Standard for Discovery in
12 this judicial district.”

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14 documents beyond what is available to Waymo at present from a reasonable search of its own files
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18 Waymo has no responsive documents in Waymo’s possession, custody, or control. If Waymo is
19 unable to locate responsive documents through a reasonably diligent search, Waymo will so state.

20 Waymo’s responses are not to be construed as an admission that any of the requested
21 information exists, that any information is admissible, relevant or proportional to the needs of the
22 case, or that any contention or assumption contained in the requests, whether implicit or explicit,
23 is correct.

24 Waymo responds to these requests based upon its current understanding and reserves the
25 right to supplement its responses at a later time.

26 Waymo incorporates by reference its General Objections in each of the specific responses
27 set forth below.

28

SPECIFIC OBJECTIONS AND RESPONSES

Waymo objects and responds as follows to Defendants' document requests:

REQUEST FOR PRODUCTION NO. 147:

All communications with Lyft about past, current, or potential competition with Uber.

RESPONSE TO REQUEST FOR PRODUCTION NO. 147:

Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative access to relevant information, the parties' resources, the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit.

Waymo will produce all communications with Lyft about past, current, or potential competition with Uber as located through a reasonably diligent search.

REQUEST FOR PRODUCTION NO. 148:

All documents relating to Waymo's analysis of Lyft as a potential acquisition target, including Lyft's past, current, or potential competition with Uber.

RESPONSE TO REQUEST FOR PRODUCTION NO. 148:

Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative access to relevant information, the parties' resources, the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit. Waymo further objects to this request to the extent that it seeks information protected by the attorney-client privilege or the work product doctrine or that is otherwise privileged or protected from discovery.

1 Waymo will produce all documents relating to Waymo's analysis of Lyft as a potential
2 acquisition target as located through a reasonably diligent search.

3
4 **REQUEST FOR PRODUCTION NO. 149:**

5 All agreements (including exhibits) with Lyft regarding autonomous vehicles, including
6 the "deal" between Waymo and Lyft identified in the May 14, 2017 *New York Times* article titled
7 "Lyft and Waymo Reach Deal to Collaborate on Self-Driving Cars."

8
9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 149:**

10 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
11 the case, considering the importance of the issues at stake in the action, the amount in controversy,
12 the parties' relative access to relevant information, the parties' resources, the importance of the
13 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
14 outweighs its likely benefit. Waymo further objects to this request to the extent that it seeks
15 information protected by the attorney-client privilege or the work product doctrine or that is
16 otherwise privileged or protected from discovery.

17 Waymo will not produce documents in response to this request.

18
19 **REQUEST FOR PRODUCTION NO. 150:**

20 Any letter of intent or interest relating to the "deal" between Waymo and Lyft identified in
21 the May 14, 2017 *New York Times* article.

22
23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 150:**

24 Waymo objects to this request as irrelevant, overbroad and not proportional to the needs of
25 the case, considering the importance of the issues at stake in the action, the amount in controversy,
26 the parties' relative access to relevant information, the parties' resources, the importance of the
27 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
28 outweighs its likely benefit. Waymo further objects to this request to the extent that it seeks

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 161:**

2 Waymo objects to this request as overbroad and not proportional to the needs of the case,
3 considering the importance of the issues at stake in the action, the amount in controversy, the
4 parties' relative access to relevant information, the parties' resources, the importance of the
5 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
6 outweighs its likely benefit.

7 For each day on which any individual revised Defendants' Exhibit 1031, Bates-paged
8 WAYMO-UBER-00004175-WAYMO-UBER-00004194, Waymo will produce the final version
9 of that document from that day.

10
11 **REQUEST FOR PRODUCTION NO. 162:**

12 All communications relating to preparation of Defendants' Exhibit 1031, Bates-paged
13 WAYMO-UBER-00004175-WAYMO-UBER-00004194.

14
15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 162:**

16 Waymo objects to this request as overbroad and not proportional to the needs of the case,
17 considering the importance of the issues at stake in the action, the amount in controversy, the
18 parties' relative access to relevant information, the parties' resources, the importance of the
19 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
20 outweighs its likely benefit.

21 Waymo will produce all communications relating to the preparation of Defendants' Exhibit
22 1031, Bates-paged WAYMO-UBER-00004175-WAYMO-UBER-00004194, as located through a
23 reasonably diligent search.

24 DATED: June 16, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

25
26 By /s/ Charles K. Verhoeven

Charles K. Verhoeven
Attorneys for WAYMO LLC

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9 Attorneys for Plaintiff WAYMO LLC

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 WAYMO LLC

14 Plaintiffs,

15 v.

16 UBER TECHNOLOGIES, INC.;
17 OTTOMOTTO, LLC; OTTO TRUCKING
18 LLC,

19 Defendants.

Case No. 17-cv-00939-JCS

**PLAINTIFF'S RESPONSES AND
OBJECTIONS TO UBER'S THIRD SET
OF REQUESTS FOR PRODUCTIONS
(NO. 163)**

1 Plaintiff Waymo, LLC (“Waymo”) hereby objects and responds to the Third Set of
2 Requests for Production of Documents (No. 163) served by Defendants Uber Technologies, Inc.
3 (“Uber”) and Ottomotto LLC (“Otto) (collectively, “Defendants”).

4 **GENERAL OBJECTIONS**

5 Waymo makes the following General Objections, whether or not separately set forth in
6 response to each and every definition and document request.

7 Waymo objects to each request, and to the Definitions and Instructions, to the extent that
8 they purport to impose any obligations upon Waymo beyond the Federal Rules of Civil Procedure,
9 the Local Rules of the United States District Court for the Northern District of California, and the
10 Supplemental Order to Order Setting Initial Case Management Conference in Civil Cases Before
11 Judge William Alsup (“the Supplemental Order”).

12 Waymo objects to each request to the extent that it seeks information protected by the
13 attorney-client privilege or the work product doctrine or that is otherwise privileged or protected
14 from discovery.

15 Waymo objects to each request to the extent that they are compound, complex and contain
16 multiple subparts.

17 Waymo objects to each request to the extent that they seek confidential or proprietary
18 information, including without limitation, confidential business information, proprietary and/or
19 competitively sensitive information, or trade secrets. Subject to its other General Objections, and
20 to any specific objections set forth below, Waymo will only provide relevant information in a
21 manner consistent with the Protective Order entered by the Court in this matter.

22 Waymo objects to each interrogatory to the extent that they seek information that Waymo
23 is not permitted to disclose pursuant to confidentiality obligations or agreements with third parties.

24 Waymo objects to each request to the extent that it calls for information that is publicly
25 available and therefore as accessible to Defendants as to Waymo.

26 Waymo objects to each request to the extent that it is overbroad and not proportional to the
27 needs of the case, considering the importance of the issues at stake in the action, the amount in
28 controversy, the parties’ relative access to relevant information, the parties’ resources, the

1 importance of the discovery in resolving the issues, and whether the burden or expense of the
2 proposed discovery outweighs its likely benefit.

3 Waymo objects to each request to the extent that they require Waymo to provide
4 documents beyond what is available to Waymo at present from a reasonable search of its own files
5 likely to contain relevant or responsive documents.

6 Waymo objects to each request to the extent that they are overbroad, unduly burdensome,
7 vague, and/or ambiguous.

8 Waymo objects to each request to the extent that it seeks information that does not already
9 exist, or that is not in Waymo's possession, custody, or control.

10 Waymo objects to each request to the extent that they are unlimited in time or otherwise
11 not limited to a time frame relevant to this litigation and to the patents-in-suit, and therefore
12 burdensome, oppressive, overly broad, and not proportional to the needs of the case.

13 Waymo objects to the definitions of "Waymo," "Plaintiff," "You," and "Your" on the
14 grounds the definitions are overbroad, unduly burdensome, and vague, including, but not limited
15 to, the extent that they include Alphabet Inc. or any Waymo subsidiary, subcontractor, partnership,
16 joint venture, or other business cooperation involving Waymo LLC, Google Inc., and/or Alphabet
17 Inc., the present and former officers, directors, employees, agents, representatives, accountants,
18 financial advisors, consultants, and attorneys or other persons under the owned or controlled by
19 Waymo LLC, Google Inc., and/or Alphabet Inc., regardless of their affiliation or employment.

20 Waymo objects to each and every request to the extent that they call for a legal conclusion.

21 Waymo objects to the definitions of "Uber", "Ottomotto," and "Otto Trucking" as
22 overbroad, and vague and ambiguous because Waymo does not know, for example, all "agents" or
23 "representatives," etc. of each entity.

24 Waymo objects to the definition of "Velodyne" as overbroad, and vague and ambiguous
25 because Waymo does not know, for example, all "agents" or "representatives", etc. of Velodyne.

26 Waymo objects to the definition of "Side Project(s)" and "Side Business(es)" as overly
27 broad, unduly burdensome, vague and ambiguous, to the extent that the definition includes
28 personal side project(s) or business(es).

1 Waymo objects to Instruction No. 3 as irrelevant, overbroad, unduly burdensome, and not
2 proportional to the needs of the case to the extent it calls for production in a form beyond that
3 required by the Supplemental Order.

4 Waymo objects to Instruction No. 5 as irrelevant, overbroad, unduly burdensome, and not
5 proportional to the needs of the case to the extent it calls for “[a]ll drafts of a responsive
6 document.”

7 Waymo objects to Instruction No. 6 as irrelevant, overbroad, unduly burdensome, and not
8 proportional to the needs of the case to the extent that it calls for the “file folder or other container
9 in which a Document is kept.”

10 Waymo objects to Instruction No. 10 as overbroad, unduly burdensome, vague, and
11 ambiguous to the extent that it refers to “Provision 1(d) of the Default Standard for Discovery in
12 this judicial district.”

13 Waymo objects to Instruction No. 11 to the extent it calls for Waymo to search for
14 documents beyond what is available to Waymo at present from a reasonable search of its own files
15 likely to contain relevant or responsive documents. Waymo will produce English translations
16 where applicable as located through a reasonably diligent search.

17 Waymo objects to Instruction No. 12 to the extent that it calls for Waymo to conclude that
18 Waymo has no responsive documents in Waymo’s possession, custody, or control. If Waymo is
19 unable to locate responsive documents through a reasonably diligent search, Waymo will so state.

20 Waymo’s responses are not to be construed as an admission that any of the requested
21 information exists, that any information is admissible, relevant or proportional to the needs of the
22 case, or that any contention or assumption contained in the requests, whether implicit or explicit,
23 is correct.

24 Waymo responds to these requests based upon its current understanding and reserves the
25 right to supplement its responses at a later time.

26 Waymo incorporates by reference its General Objections in each of the specific responses
27 set forth below.
28

SPECIFIC OBJECTIONS AND RESPONSES

Waymo objects and responds as follows to Defendants' document requests:

REQUEST FOR PRODUCTION NO. 163:

All Documents and Communications relating to any anticipated or actual payments owed or made to Anthony Levandowski under the Project Chauffeur bonus program, including but not limited to all Documents and Communications relating to the timing and amount of those payments.

RESPONSE TO REQUEST FOR PRODUCTION NO. 163:

Waymo has produced all documents and communications relating to anticipated or actual payments owed and/or made to Anthony Levandowski under the Project Chauffeur Bonus Program, as located through a reasonably diligent search of locations likely to contain responsive information regardless of whether that location is exclusive to Waymo LLC.

For example, Waymo has produced the Project Chauffeur Bonus Program, which specifies the timing of payments under the Program. See WAYMO-UBER-00014078. Waymo has produced documents showing the dates and amounts of the actual payments made to Levandowski. See, e.g., WAYMO-UBER-00014099, WAYMO-UBER-00014469. Waymo has also produced communications relating to the timing and amount of these payments. See, e.g., WAYMO-UBER-00012019, WAYMO-UBER-00023030, WAYMO-UBER-00023035, WAYMO-UBER-00026471; WAYMO-UBER-00006389.

DATED: July 17, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

By /s/ Charles K. Verhoeven

Charles K. Verhoeven
Attorneys for WAYMO LLC

APPENDIX

Information On Document Collection and Production Under Supplement Order ¶ 13

Waymo further provides information on its collection efforts under Paragraph 13 of the Supplemental Order. As of July 17, 2017, Waymo has searched the following sources of information in response to Defendants' requests for production:

- Waymo custodial document repositories (e.g., email repositories, Google Docs, locally stored electronic documents)
- Waymo non-custodial document repositories (e.g., Drive folders used by various teams at Waymo, personnel files, Google personnel files including policy documents, codes of conduct, employee handbooks, and employment and confidentiality agreements)
- Sources listed in Waymo's search list provided July 3, 2017

As of July 17, 2017, the following individuals employed by Waymo or Google have searched for documents in response to Defendants' requests for production:

- Raquel Small-Weikert (Paralegal) – general search responsibility
- Christine Lok (Paralegal) – general search responsibility
- Suzie Gonzalez-Pender (Paralegal) - general search responsibility
- Toni Baker (Discovery Staff Attorney) – general search responsibility
- Margo Maddux (Patent Agent) – search responsibility relating to patent-related documentation
- Michael Lin (People Coordinator) – search responsibility relating to employment documentation and electronic device recovery
- Joanne Chin (Head of People Operations) – search responsibility relating to employment documentation and electronic device recovery
- Jack Brown (Waymo, CAD Data and PLM Program Manager) – search responsibility relating to Waymo secure server access and activity
- Pierre Yves-Droz (Waymo, Principal Hardware Engineer) – search responsibility relating to documents relating to LiDAR development
- Caroline Manchot (Director of Compensation) – search responsibility relating to

documents relating to the bonus plan

- Ron Medford (Waymo, Director of Safety) – search responsibility relating to documents submitted to or discussed with a public entity
- Matt Salwasser (Waymo, Product Manager) – search responsibility relating to documents submitted to or discussed with a public entity
- Gary Brown (Security Engineer, Forensics) – search responsibility relating to forensic investigations and network/server/device activity detection
- Kristinn Gudjonsson (Security Engineer, Forensics) – search responsibility relating to forensic investigations and network/server/device activity detection
- Sasha Zbrozek (Hardware Engineer) - search responsibility relating to download activity of Waymo personnel
- Raghav Kohli (Commercial Counsel) – search responsibility relating to Lyft
- Laurens Feenstra (Product Manager) – search responsibility relating to Lyft
- Min Li Chan (Product Manager) – search responsibility relating to Lyft
- Michael Epstein (Product Manager) – search responsibility relating to “Entering the Taas Market” document
- Gerard Dwyer (Finance Director) – search responsibility for documents concerning Waymo finances
- Andrew Chatham (Software Engineer) – search responsibility for documents for documents concerning market plans
- Annie Wang (Finance Team) - search responsibility for documents concerning Waymo finances
- Andrew Price (Ethics and Compliance Counsel) - search responsibility relating to side businesses

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9 Attorneys for Plaintiff WAYMO LLC

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 WAYMO LLC

14 Plaintiffs,

15 v.

16 UBER TECHNOLOGIES, INC.;
17 OTTOMOTTO, LLC; OTTO TRUCKING
18 LLC,

19 Defendants.

Case No. 17-cv-00939-JCS

**PLAINTIFF'S RESPONSES AND
OBJECTIONS TO UBER'S FOURTH SET
OF REQUESTS FOR PRODUCTIONS
(NO. 164-166)**

1 Plaintiff Waymo, LLC (“Waymo”) hereby objects and responds to the Fourth Set of
2 Requests for Production of Documents (Nos. 164-166) served by Defendants Uber Technologies,
3 Inc. (“Uber”) and Ottomotto LLC (“Otto”) (collectively, “Defendants”).

4 **GENERAL OBJECTIONS**

5 Waymo makes the following General Objections, whether or not separately set forth in
6 response to each and every definition and document request.

7 Waymo objects to each request, and to the Definitions and Instructions, to the extent that
8 they purport to impose any obligations upon Waymo beyond the Federal Rules of Civil Procedure,
9 the Local Rules of the United States District Court for the Northern District of California, and the
10 Supplemental Order to Order Setting Initial Case Management Conference in Civil Cases Before
11 Judge William Alsup (“the Supplemental Order”).

12 Waymo objects to each request to the extent that it seeks information protected by the
13 attorney-client privilege or the work product doctrine or that is otherwise privileged or protected
14 from discovery.

15 Waymo objects to each request to the extent that they are compound, complex and contain
16 multiple subparts.

17 Waymo objects to each request to the extent that they seek confidential or proprietary
18 information, including without limitation, confidential business information, proprietary and/or
19 competitively sensitive information, or trade secrets. Subject to its other General Objections, and
20 to any specific objections set forth below, Waymo will only provide relevant information in a
21 manner consistent with the Protective Order entered by the Court in this matter.

22 Waymo objects to each interrogatory to the extent that they seek information that Waymo
23 is not permitted to disclose pursuant to confidentiality obligations or agreements with third parties.

24 Waymo objects to each request to the extent that it calls for information that is publicly
25 available and therefore as accessible to Defendants as to Waymo.

26 Waymo objects to each request to the extent that it is overbroad and not proportional to the
27 needs of the case, considering the importance of the issues at stake in the action, the amount in
28 controversy, the parties’ relative access to relevant information, the parties’ resources, the

1 importance of the discovery in resolving the issues, and whether the burden or expense of the
2 proposed discovery outweighs its likely benefit.

3 Waymo objects to each request to the extent that they require Waymo to provide
4 documents beyond what is available to Waymo at present from a reasonable search of its own files
5 likely to contain relevant or responsive documents.

6 Waymo objects to each request to the extent that they are overbroad, unduly burdensome,
7 vague, and/or ambiguous.

8 Waymo objects to each request to the extent that it seeks information that does not already
9 exist, or that is not in Waymo's possession, custody, or control.

10 Waymo objects to each request to the extent that they are unlimited in time or otherwise
11 not limited to a time frame relevant to this litigation and to the patents-in-suit, and therefore
12 burdensome, oppressive, overly broad, and not proportional to the needs of the case.

13 Waymo objects to the definitions of "Waymo," "Plaintiff," "You," and "Your" on the
14 grounds the definitions are overbroad, unduly burdensome, and vague, including, but not limited
15 to, the extent that they include Alphabet Inc. or any Waymo subsidiary, subcontractor, partnership,
16 joint venture, or other business cooperation involving Waymo LLC, Google Inc., and/or Alphabet
17 Inc., the present and former officers, directors, employees, agents, representatives, accountants,
18 financial advisors, consultants, and attorneys or other persons under the owned or controlled by
19 Waymo LLC, Google Inc., and/or Alphabet Inc., regardless of their affiliation or employment.
20 Waymo applies these terms to mean Google's self-driving project, from its inception in 2009
21 through the present.

22 Waymo objects to each and every request to the extent that they call for a legal conclusion.

23 Waymo objects to the definitions of "Uber", "Ottomotto," and "Otto Trucking" as
24 overbroad, and vague and ambiguous because Waymo does not know, for example, all "agents" or
25 "representatives," etc. of each entity.

26 Waymo objects to Instruction No. 3 as irrelevant, overbroad, unduly burdensome, and not
27 proportional to the needs of the case to the extent it calls for production in a form beyond that
28 required by the Supplemental Order.

1 Waymo objects to Instruction No. 5 as irrelevant, overbroad, unduly burdensome, and not
2 proportional to the needs of the case to the extent it calls for “[a]ll drafts of a responsive
3 document.”

4 Waymo objects to Instruction No. 6 as irrelevant, overbroad, unduly burdensome, and not
5 proportional to the needs of the case to the extent that it calls for the “file folder or other container
6 in which a Document is kept.”

7 Waymo objects to Instruction No. 10 as overbroad, unduly burdensome, vague, and
8 ambiguous to the extent that it refers to “Provision 1(d) of the Default Standard for Discovery in
9 this judicial district.”

10 Waymo objects to Instruction No. 11 to the extent it calls for Waymo to search for
11 documents beyond what is available to Waymo at present from a reasonable search of its own files
12 likely to contain relevant or responsive documents. Waymo will produce English translations
13 where applicable as located through a reasonably diligent search.

14 Waymo objects to Instruction No. 12 to the extent that it calls for Waymo to conclude that
15 Waymo has no responsive documents in Waymo’s possession, custody, or control. If Waymo is
16 unable to locate responsive documents through a reasonably diligent search, Waymo will so state.

17 Waymo’s responses are not to be construed as an admission that any of the requested
18 information exists, that any information is admissible, relevant or proportional to the needs of the
19 case, or that any contention or assumption contained in the requests, whether implicit or explicit,
20 is correct.

21 Waymo responds to these requests based upon its current understanding and reserves the
22 right to supplement its responses at a later time.

23 Waymo incorporates by reference its General Objections in each of the specific responses
24 set forth below.

25 **SPECIFIC OBJECTIONS AND RESPONSES**

26 Waymo objects and responds as follows to Defendants’ document requests:
27
28

1 **REQUEST FOR PRODUCTION NO. 164:**

2 All documents and communications relating to the possibility of Waymo and Uber
3 working together or partnering in any way in connection with self-driving vehicles or technology,
4 including but not limited to all communications between Travis Kalanick and Larry Page
5 concerning this subject.

6
7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 164:**

8 Waymo objects to the request on the ground that communications between Travis Kalanick
9 and Larry Page are equally available to Uber. Waymo objects to this request as overlapping with
10 prior RFPs including RFP 93 (“Documents relating to Waymo’s business plans, strategic plans,
11 operating plans....”).

12 Waymo will produce communications involving Waymo and Alphabet personnel
13 concerning the possibility of a partnership between Waymo and Uber involving self-driving
14 vehicles or technology, as located through a reasonably diligent search including the email data of
15 Mr. Page.

16
17 **REQUEST FOR PRODUCTION NO. 165:**

18 All documents and communications related to compensation, bonuses, or equity for current
19 or former Waymo employees working on autonomous vehicles or technology, including, but not
20 limited to, all documents and communications concerning Waymo’s delay or withholding of
21 payment, the financial impact of such payment on Waymo, and statements made by Waymo
22 executives and officers regarding such compensation, bonus, and/or equity programs (e.g., the
23 Project Chauffeur bonus program).

24
25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 165**

26 Waymo objects to this request as overbroad, irrelevant, and not proportional to the needs
27 of the case. Waymo objects to this request as compound, calling for both documents relating to
28 employee compensation and for executive statements regarding compensation. Waymo

1 understands “Waymo employees” to mean employees of the self-driving car program from 2009
2 to present.

3 Waymo will produce documents sufficient to show the amount and timing of payments
4 made to employees under the Project Chauffeur bonus program. Waymo will also produce
5 documents sufficient to show the overall personnel costs of the self-driving car program from
6 2009 to the present.

7
8 **REQUEST FOR PRODUCTION NO. 166:**

9 All documents and communications concerning any complaints, arguments, disputes,
10 conflicts, and evaluations (both positive and negative) related to Anthony Levandowski during his
11 employment at Waymo, including without limitation any concerns that Waymo or its employees
12 had regarding Mr. Levandowski.

13
14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 166:**

15 Waymo objects to this request as vague, overbroad, irrelevant, and not proportional to the
16 needs of the case. It is not tenable or proportional to locate every document involving any
17 complaint, argument, dispute, or conflict relating to Mr. Levandowski.

18 Through Waymo’s responses to previous requests for production, Waymo has already
19 produced Mr. Levandowski’s performance evaluations and as well as all emails concerning
20 complaints, arguments, disputes, conflicts, and evaluations involving Mr. Levandowski, as located
21 through a reasonably diligent search. See, e.g., WAYMO-UBER-00009503, WAYMO-UBER-
22 00010496.

23
24 DATED: July 28, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

25
26 By /s/ Charles K. Verhoeven

Charles K. Verhoeven
Attorneys for WAYMO LLC

APPENDIX

Information On Document Collection and Production Under Supplement Order ¶ 13

Waymo further provides information on its collection efforts under Paragraph 13 of the Supplemental Order. As of July 28, 2017, Waymo has searched the following sources of information in response to Defendants' requests for production:

- Waymo custodial document repositories (e.g., email repositories, Google Docs, locally stored electronic documents)
- Waymo non-custodial document repositories (e.g., Drive folders used by various teams at Waymo, personnel files, Google personnel files including policy documents, codes of conduct, employee handbooks, and employment and confidentiality agreements)
- Sources listed in Waymo's search list provided July 3, 2017

As of July 28, 2017, the following individuals employed by Waymo or Google have searched for documents in response to Defendants' requests for production:

- Raquel Small-Weikert (Paralegal) – general search responsibility
- Christine Lok (Paralegal) – general search responsibility
- Suzie Gonzalez-Pender (Paralegal) - general search responsibility
- Toni Baker (Discovery Staff Attorney) – general search responsibility
- Margo Maddux (Patent Agent) – search responsibility relating to patent-related documentation
- Michael Lin (People Coordinator) – search responsibility relating to employment documentation and electronic device recovery
- Joanne Chin (Head of People Operations) – search responsibility relating to employment documentation and electronic device recovery
- Jack Brown (Waymo, CAD Data and PLM Program Manager) – search responsibility relating to Waymo secure server access and activity
- Pierre Yves-Droz (Waymo, Principal Hardware Engineer) – search responsibility relating to documents relating to LiDAR development
- Caroline Manchot (Director of Compensation) – search responsibility relating to

documents relating to the bonus plan

- Ron Medford (Waymo, Director of Safety) – search responsibility relating to documents submitted to or discussed with a public entity
- Matt Salwasser (Waymo, Product Manager) – search responsibility relating to documents submitted to or discussed with a public entity
- Gary Brown (Security Engineer, Forensics) – search responsibility relating to forensic investigations and network/server/device activity detection
- Kristinn Gudjonsson (Security Engineer, Forensics) – search responsibility relating to forensic investigations and network/server/device activity detection
- Sasha Zbrozek (Hardware Engineer) - search responsibility relating to download activity of Waymo personnel
- Raghav Kohli (Commercial Counsel) – search responsibility relating to Lyft, M&A documents
- Laurens Feenstra (Product Manager) – search responsibility relating to Lyft
- Min Li Chan (Product Manager) – search responsibility relating to Lyft
- Michael Epstein (Product Manager) – search responsibility relating to “Entering the Taas Market” document
- Gerard Dwyer (Finance Director) – search responsibility for documents concerning Waymo finances
- Andrew Chatham (Software Engineer) – search responsibility for documents for documents concerning market plans
- Annie Wang (Finance Team) - search responsibility for documents concerning Waymo finances
- Andrew Price (Ethics and Compliance Counsel) - search responsibility relating to side businesses
- Amar Mehta (Corporate Counsel) – search responsibility relating to M&A documents

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9 Attorneys for Plaintiff WAYMO LLC

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13 WAYMO LLC

14 Plaintiffs,

15 v.

16 UBER TECHNOLOGIES, INC.;
17 OTTOMOTTO, LLC; OTTO TRUCKING
18 LLC,

19 Defendants.

Case No. 17-cv-00939-JCS

**PLAINTIFF'S RESPONSES AND
OBJECTIONS TO UBER'S FIFTH SET
OF REQUESTS FOR PRODUCTIONS
(NO. 167-175)**

1 Plaintiff Waymo, LLC (“Waymo”) hereby objects and responds to the Fifth Set of
2 Requests for Production of Documents (Nos. 167-175) served by Defendants Uber Technologies,
3 Inc. (“Uber”) and Ottomotto LLC (“Otto”) (collectively, “Defendants”).

4 **GENERAL OBJECTIONS**

5 Waymo makes the following General Objections, whether or not separately set forth in
6 response to each and every definition and document request.

7 Waymo objects to each request, and to the Definitions and Instructions, to the extent that
8 they purport to impose any obligations upon Waymo beyond the Federal Rules of Civil Procedure,
9 the Local Rules of the United States District Court for the Northern District of California, and the
10 Supplemental Order to Order Setting Initial Case Management Conference in Civil Cases Before
11 Judge William Alsup (“the Supplemental Order”).

12 Waymo objects to each request to the extent that it seeks information protected by the
13 attorney-client privilege or the work product doctrine or that is otherwise privileged or protected
14 from discovery.

15 Waymo objects to each request to the extent that they are compound, complex and contain
16 multiple subparts.

17 Waymo objects to each request to the extent that they seek confidential or proprietary
18 information, including without limitation, confidential business information, proprietary and/or
19 competitively sensitive information, or trade secrets. Subject to its other General Objections, and
20 to any specific objections set forth below, Waymo will only provide relevant information in a
21 manner consistent with the Protective Order entered by the Court in this matter.

22 Waymo objects to each interrogatory to the extent that they seek information that Waymo
23 is not permitted to disclose pursuant to confidentiality obligations or agreements with third parties.

24 Waymo objects to each request to the extent that it calls for information that is publicly
25 available and therefore as accessible to Defendants as to Waymo.

26 Waymo objects to each request to the extent that it is overbroad and not proportional to the
27 needs of the case, considering the importance of the issues at stake in the action, the amount in
28 controversy, the parties’ relative access to relevant information, the parties’ resources, the

1 importance of the discovery in resolving the issues, and whether the burden or expense of the
2 proposed discovery outweighs its likely benefit.

3 Waymo objects to each request to the extent that they require Waymo to provide
4 documents beyond what is available to Waymo at present from a reasonable search of its own files
5 likely to contain relevant or responsive documents.

6 Waymo objects to each request to the extent that they are overbroad, unduly burdensome,
7 vague, and/or ambiguous.

8 Waymo objects to each request to the extent that it seeks information that does not already
9 exist, or that is not in Waymo's possession, custody, or control.

10 Waymo objects to each request to the extent that they are unlimited in time or otherwise
11 not limited to a time frame relevant to this litigation and to the patents-in-suit, and therefore
12 burdensome, oppressive, overly broad, and not proportional to the needs of the case.

13 Waymo objects to each and every request to the extent that they call for a legal conclusion.

14 Waymo objects to the definitions of "Waymo," "Plaintiff," "You," and "Your" on the
15 grounds the definitions are overbroad, unduly burdensome, and vague, including, but not limited
16 to, the extent that they include Alphabet Inc. or any Waymo subsidiary, subcontractor, partnership,
17 joint venture, or other business cooperation involving Waymo LLC, Google Inc., and/or Alphabet
18 Inc., the present and former officers, directors, employees, agents, representatives, accountants,
19 financial advisors, consultants, and attorneys or other persons under the owned or controlled by
20 Waymo LLC, Google Inc., and/or Alphabet Inc., regardless of their affiliation or employment.
21 Waymo applies these terms to mean Google's self-driving project, from its inception in 2009
22 through the present.

23 Waymo objects to the definitions of "Uber", "Ottomotto," and "Otto Trucking" as
24 overbroad, and vague and ambiguous because Waymo does not know, for example, all "agents" or
25 "representatives," etc. of each entity.

26 Waymo objects to Instruction No. 3 as irrelevant, overbroad, unduly burdensome, and not
27 proportional to the needs of the case to the extent it calls for production in a form beyond that
28 required by the Supplemental Order.

1 Waymo objects to Instruction No. 5 as irrelevant, overbroad, unduly burdensome, and not
2 proportional to the needs of the case to the extent it calls for “[a]ll drafts of a responsive
3 document.”

4 Waymo objects to Instruction No. 6 as irrelevant, overbroad, unduly burdensome, and not
5 proportional to the needs of the case to the extent that it calls for the “file folder or other container
6 in which a Document is kept.”

7 Waymo objects to Instruction No. 10 as overbroad, unduly burdensome, vague, and
8 ambiguous to the extent that it refers to “Provision 1(d) of the Default Standard for Discovery in
9 this judicial district.”

10 Waymo objects to Instruction No. 11 to the extent it calls for Waymo to search for
11 documents beyond what is available to Waymo at present from a reasonable search of its own files
12 likely to contain relevant or responsive documents. Waymo will produce English translations
13 where applicable as located through a reasonably diligent search.

14 Waymo objects to Instruction No. 12 to the extent that it calls for Waymo to conclude that
15 Waymo has no responsive documents in Waymo’s possession, custody, or control. If Waymo is
16 unable to locate responsive documents through a reasonably diligent search, Waymo will so state.

17 Waymo’s responses are not to be construed as an admission that any of the requested
18 information exists, that any information is admissible, relevant or proportional to the needs of the
19 case, or that any contention or assumption contained in the requests, whether implicit or explicit,
20 is correct.

21 Waymo responds to these requests based upon its current understanding and reserves the
22 right to supplement its responses at a later time.

23 Waymo incorporates by reference its General Objections in each of the specific responses
24 set forth below.

25 **SPECIFIC OBJECTIONS AND RESPONSES**

26 Waymo objects and responds as follows to Defendants’ document requests:
27
28

1 **REQUEST FOR PRODUCTION NO. 167:**

2 All Documents and Communications relating to Your efforts to explore, enter, or
3 otherwise participate in the market for ride-sharing or transportation as a service (TaaS), whether
4 on Your own or through a partnership, joint venture, or other business relationship with another
5 company including but not limited to: (1) the application of self-driving vehicles or self-driving
6 technology to ride-sharing or TaaS; (2) Your timing and reasons for engaging in such efforts; (3)
7 any analyses or discussions of the ride-sharing or TaaS market; (4) any analyses or discussions of
8 actual or potential competition between Defendants, on one hand, and Waymo, Google, Inc.,
9 Alphabet, Inc., or any of their affiliates, on the other hand, in the market for ride-sharing or TaaS;
10 and (5) all Communications to, from, with, or involving David Drummond relating to Your efforts
11 to explore, enter, or otherwise participate in the market for ride-sharing or TaaS.

12
13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 167:**

14 Waymo objects to this request as unduly broad, burdensome, and compound, seeking to
15 cover in a single RFP the entirety of Waymo's business affairs in the TaaS space. Waymo objects
16 to this request to the extent it defines "Waymo" beyond the self-driving program from 2009
17 through the present. Waymo objects to this request to the extent that it seeks information
18 protected by the attorney-client privilege or the work product doctrine or that is otherwise
19 privileged or protected from discovery, including but not limited to communications involving Mr.
20 Drummond.

21 Waymo has already produced the documents that would be produced in response to this
22 request in response to previous requests, including but not limited to RFP Nos. 93, 96, and 97, and
23 will further produce documents in accord with the Court's order (Dkt. 1051). Waymo will
24 additionally produce all communications involving Mr. Drummond relating to Waymo's efforts to
25 explore, enter, or otherwise participate in the market for ride-sharing or TaaS, as located through a
26 reasonably diligent search of Mr. Drummond's custodial email data.

1 **REQUEST FOR PRODUCTION NO. 168:**

2 All Communications to, from, with, or involving David Drummond relating to ride-sharing
3 or TaaS, self-driving vehicles or self-driving technology, Defendants, Anthony Levandowski, or
4 this Action.

5
6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 168:**

7 Waymo objects to this request to the extent that it seeks information protected by the
8 attorney-client privilege or the work product doctrine or that is otherwise privileged or protected
9 from discovery, including but not limited to communications involving this Action.

10 Waymo will produce all communications involving Mr. Drummond relating to ride-
11 sharing or TaaS, self-driving vehicles or self-driving technology, Mr. Levandowski, and this
12 Action, as located through a reasonably diligent search. To the extent those communications
13 relate to Defendants, Waymo will produce those communications as well, but Waymo will not
14 generally search for all communications relating to Defendants in any way.

15
16 **REQUEST FOR PRODUCTION NO. 169:**

17 All Documents and Communications relating to Your decision to purchase shares or
18 otherwise invest in Uber, including but not limited to: (1) all Documents concerning Your
19 motivation for such purchases or investments; and (2) any discussion or analysis of those
20 purchases or investments.

21
22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 169:**

23 Waymo objects to this request as irrelevant, overbroad, and not proportional to the needs
24 of the case, particularly given that Google invested in Uber in August 2013, more than a year
25 before Uber announced its interest in developing or using self-driving car technology.

26 Waymo will produce all documents concerning Google's analysis of its ongoing
27 investment in Uber to the extent that that analysis discusses or analyzes Uber's self-driving car
28 technology, as located through a reasonably diligent search.

REQUEST FOR PRODUCTION NO. 170:

All Documents and Communications relating to any transaction contemplated, anticipated, initiated, or completed by Waymo (including but not limited to any acquisition, merger, joint ventures, partnerships, or investment) that was motivated primarily or in part by the acquiring, hiring, or recruitment of talent or employees in conjunction with such transaction, including but not limited to: any acquisition which can be or has been characterized as an “acqui-hire,” and any transaction with a company or companies that had yet to commercialize any of its products or tangible assets, including intellectual property. This request includes but is not limited to all Documents and Communications relating to Waymo’s due diligence processes for any such transaction and compensation, bonuses or equity provided or contemplated in conjunction with any such transaction.

RESPONSE TO REQUEST FOR PRODUCTION NO. 170:

Waymo objects to this request as overbroad, irrelevant, and not proportional to the needs of the case to the extent it seeks information concerning acquisitions by Google or Alphabet unrelated to the self-driving car business. Waymo objects to this request to the extent that it seeks information protected by the attorney-client privilege or the work product doctrine or that is otherwise privileged or protected from discovery.

Waymo will produce all documents relating to Waymo’s acquisitions in the self-driving space, including Waymo’s due diligence into those acquisitions and related compensation, bonuses, or equity, as located through a reasonably diligent search.

REQUEST FOR PRODUCTION NO. 171:

Documents sufficient to show the timing, character, nature, claims, parties, purpose, and resolution (including but not limited to any damages, equitable relief, or settlement negotiations) of all legal action(s) (including but not limited to demand letters, arbitrations, mediations, or lawsuits) taken by Waymo against any former employee(s) or any subsequent employer(s) of such former employee(s).

RESPONSE TO REQUEST FOR PRODUCTION NO. 171:

Waymo objects to this request to the extent it seeks information relating to Google or Alphabet's claims against former employees or their subsequent employers unrelated to the self-driving car space. Waymo objects to this request to the extent that it seeks information protected by the attorney-client privilege or the work product doctrine or that is otherwise privileged or protected from discovery. Waymo further objects to this request as irrelevant because any responsive information would not make any fact of consequence more or less likely. The Court has already ruled that Google's common-defense agreements unrelated to this Action are not relevant. Similarly, Google's and Waymo's actions taken against former employees are not relevant.

Waymo will not produce documents responsive to this request.

REQUEST FOR PRODUCTION NO. 172:

Documents sufficient to show Waymo's due diligence efforts for any transaction contemplated, anticipated, initiated, or completed by Waymo (including but not limited to any acquisitions, mergers, joint ventures, partnerships, or investments) from 2007 to the present, including: (1) the processes, procedures, and protocols established for such due diligence efforts (including but not limited to those related to intellectual property); (2) the processes, procedures, and protocols followed or implemented during such due diligence efforts (including but not limited to those related to intellectual property); (3) the processes, procedures, protocols, and/or operating procedures applicable to such due diligence efforts related to intellectual property; and (4) the employment or retention of attorneys, consultants, or vendors in connection with any such due diligence efforts.

RESPONSE TO REQUEST FOR PRODUCTION NO. 172:

Waymo objects to this request as overbroad, irrelevant, and not proportional to the needs of the case to the extent it seeks information concerning transactions by Google or Alphabet unrelated to the self-driving car business. Waymo objects to this request to the extent that it seeks

1 information protected by the attorney-client privilege or the work product doctrine or that is
2 otherwise privileged or protected from discovery. Waymo further objects to this request as
3 irrelevant to the extent it seeks information that would not make any fact of consequence more or
4 less likely. The Court has already ruled that Google's common-defense agreements unrelated to
5 this Action are not relevant. Similarly, Google's and Waymo's due diligence into transactions
6 unrelated to this Action are not relevant for purposes of comparing Google's and Waymo's due
7 diligence to Uber's.

8 Waymo will produce all documents relating to Waymo's acquisitions in the self-driving
9 space, including Waymo's due diligence into those acquisitions, as located through a reasonably
10 diligent search.

11
12 **REQUEST FOR PRODUCTION NO. 173:**

13 All Documents and Communications relating to any efforts, contracts, or agreements to
14 maintain the confidentiality of or otherwise prevent the public disclosure of any aspect of any
15 transaction contemplated, anticipated, initiated, or completed by Waymo (including but not
16 limited to any acquisitions, mergers, joint ventures, partnerships, or investments), including any
17 such efforts, contracts or agreements relating to due diligence for such transactions from 2007 to
18 the present.

19
20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 173:**

21 Waymo objects to this request as overbroad, irrelevant, and not proportional to the needs
22 of the case to the extent it seeks information concerning transactions by Google or Alphabet
23 unrelated to the self-driving car business. Waymo objects to this request to the extent that it seeks
24 information protected by the attorney-client privilege or the work product doctrine or that is
25 otherwise privileged or protected from discovery. Waymo further objects to this request as
26 irrelevant because any responsive information would not make any fact of consequence more or
27 less likely.

28 Waymo will not produce documents responsive to this request.

1 **REQUEST FOR PRODUCTION NO. 174:**

2 All Documents and Communications relating to any efforts taken by Waymo to prohibit,
3 sequester, or otherwise prevent confidential, proprietary, or trade secret information of any other
4 company or entity from entering Waymo from 2007 to the present, including but not limited to
5 any investigations to identify such information and any forensic analysis efforts. This request
6 includes but is not limited to all Documents and Communications relating to any such efforts You
7 took in connection with due diligence, or acquiring, merging or investing in any company or
8 entity, or in the course of hiring, recruiting, or onboarding any employee(s).

9
10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 174:**

11 Waymo objects to this request as overbroad, irrelevant, and not proportional to the needs
12 of the case to the extent it seeks information concerning confidential, proprietary, or trade secret
13 information unrelated to the self-driving car business. Waymo objects to this request to the extent
14 that it seeks information protected by the attorney-client privilege or the work product doctrine or
15 that is otherwise privileged or protected from discovery. Waymo further objects to this request as
16 irrelevant because Waymo's efforts to prevent improper entry of proprietary information into
17 Waymo has no bearing on whether Uber misappropriated Waymo's trade secrets. Uber previously
18 asked Waymo to produce Google common-defense agreements to cast light on Uber's common-
19 defense agreement in this action, and the Court ruled that Google's common-defense agreements
20 unrelated to this Action are not relevant. Similarly, Google's and Waymo's efforts to prohibit
21 wrongful entry of confidential information are not relevant to Uber's efforts to prevent such
22 wrongful entry.

23 Waymo has already produced Google-wide policies and communications prohibiting
24 Google employees from bringing trade secret or proprietary information into Google. Waymo
25 will not produce additional documents responsive to this request.

1 **REQUEST FOR PRODUCTION NO. 175:**

2 All Documents and Communications relating to any instance where confidential,
3 proprietary, or trade secret information owned by any other company or entity has entered Waymo
4 or come into Waymo's possession. This request includes but is not limited to all Documents and
5 Communications relating to any such instances that came to Waymo's attention in connection with
6 due diligence, or acquiring, merging or investing in any company or entity, or in the course of
7 hiring, recruiting, or onboarding any employee(s).

8
9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 175:**

10 Waymo objects to this request as overbroad, irrelevant, and not proportional to the needs
11 of the case to the extent it seeks information concerning confidential, proprietary, or trade secret
12 information unrelated to the self-driving car business. Waymo objects to this request to the extent
13 that it seeks information protected by the attorney-client privilege or the work product doctrine or
14 that is otherwise privileged or protected from discovery. Waymo further objects to this request as
15 irrelevant because Waymo's efforts to prevent improper entry of proprietary information into
16 Waymo has no bearing on whether Uber misappropriated Waymo's trade secrets. Uber previously
17 asked Waymo to produce Google common-defense agreements to cast light of Uber's common-
18 defense agreement in this action, and the Court ruled that Google's common-defense agreements
19 unrelated to this Action are not relevant. Similarly, Waymo's treatment of any proprietary or trade
20 secret information that entered Waymo or came into Waymo's possession is not relevant.

21 Waymo has already produced Google-wide policies and communications prohibiting
22 Google employees from bringing trade secret or proprietary information into Google. Waymo
23 will not produce additional documents responsive to this request.

1 DATED: August 2, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

2
3 By /s/ Charles K. Verhoeven

4 Charles K. Verhoeven

Attorneys for WAYMO LLC

APPENDIX

Information On Document Collection and Production Under Supplement Order ¶ 13

Waymo further provides information on its collection efforts under Paragraph 13 of the Supplemental Order. As of August 2, 2017, Waymo has searched the following sources of information in response to Defendants' requests for production:

- Waymo custodial document repositories (e.g., email repositories, Google Docs, locally stored electronic documents)
- Waymo non-custodial document repositories (e.g., Drive folders used by various teams at Waymo, personnel files, Google personnel files including policy documents, codes of conduct, employee handbooks, and employment and confidentiality agreements)
- Sources listed in Waymo's search list provided July 3, 2017

As of August 2, 2017, the following individuals employed by Waymo or Google have searched for documents in response to Defendants' requests for production:

- Raquel Small-Weikert (Paralegal) – general search responsibility
- Christine Lok (Paralegal) – general search responsibility
- Suzie Gonzalez-Pender (Paralegal) - general search responsibility
- Toni Baker (Discovery Staff Attorney) – general search responsibility
- Meghan Landrum (Senior Counsel, Discovery) – general search responsibility
- Margo Maddux (Patent Agent) – search responsibility relating to patent-related documentation
- Michael Lin (People Coordinator) – search responsibility relating to employment documentation and electronic device recovery
- Joanne Chin (Head of People Operations) – search responsibility relating to employment documentation and electronic device recovery
- Jack Brown (Waymo, CAD Data and PLM Program Manager) – search responsibility relating to Waymo secure server access and activity
- Pierre Yves-Droz (Waymo, Principal Hardware Engineer) – search responsibility relating to documents relating to LiDAR development

- 1 • Caroline Manchot (Director of Compensation) – search responsibility relating to documents relating to the bonus plan
- 2
- 3 • Ron Medford (Waymo, Director of Safety) – search responsibility relating to documents submitted to or discussed with a public entity
- 4
- 5 • Matt Salwasser (Waymo, Product Manager) – search responsibility relating to documents submitted to or discussed with a public entity
- 6
- 7 • Gary Brown (Security Engineer, Forensics) – search responsibility relating to forensic investigations and network/server/device activity detection, log data
- 8
- 9 • Kristinn Gudjonsson (Security Engineer, Forensics) – search responsibility relating to forensic investigations and network/server/device activity detection
- 10
- 11 • Sasha Zbrozek (Hardware Engineer) - search responsibility relating to download activity of Waymo personnel
- 12
- 13 • Raghav Kohli (Commercial Counsel) – search responsibility relating to Lyft, M&A documents
- 14
- 15 • Laurens Feenstra (Product Manager) – search responsibility relating to Lyft
- 16
- 17 • Min Li Chan (Product Manager) – search responsibility relating to Lyft
- 18
- 19 • Michael Epstein (Product Manager) – search responsibility relating to “Entering the Taas Market” document
- 20
- 21 • Gerard Dwyer (Finance Director) – search responsibility for documents concerning Waymo finances
- 22
- 23 • Andrew Chatham (Software Engineer) – search responsibility for documents for documents concerning market plans
- 24
- 25 • Annie Wang (Finance Team) - search responsibility for documents concerning Waymo finances
- 26
- 27 • Andrew Price (Ethics and Compliance Counsel) - search responsibility relating to side businesses
- 28
- Amar Mehta (Corporate Counsel) – search responsibility relating to M&A documents
- Jolie Sorge (Head of HR, Google X) – search responsibility relating to documents concerning human relations and personnel
- Meiling Tan (Head of Marketing, Waymo) – search responsibility relating to marketing documents